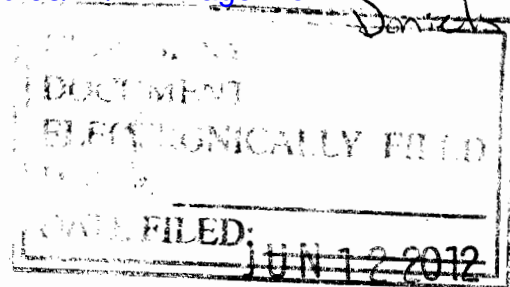


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



JEFFREY LAYDON, on behalf of himself and all
others similarly situated,

Plaintiff,

- against -

MIZUHO BANK, LTD., THE BANK OF TOKYO-
MITSUBISHI UFJ, LTD., SUMITOMO MITSUI
BANKING CORPORATION, RESONA BANK,
LTD., MIZUHO CORPORATE BANK, LTD.,
THE BANK OF YOKOHAMA, LTD.,
MITSUBISHI UFJ TRUST AND BANKING
CORPORATION, MIZUHO TRUST AND
BANKING CO., LTD., THE SUMITOMO TRUST
AND BANKING CO., LTD., CITIBANK, JAPAN
LTD., JPMORGAN CHASE BANK, NA, THE
ROYAL BANK OF SCOTLAND GROUP PLC,
DEUTSCHE BANK AG, UBS AG, BNP
PARIBAS S.A., SHINKIN CENTRAL BANK,
THE SHOKO CHUKIN BANK, THE
NORINCHUKIN BANK, BARCLAYS BANK
PLC, HSBC HOLDINGS PLC, CITIBANK NA,
CRÉDIT AGRICOLE CIB, LLOYDS BANKING
GROUP PLC, SOCIÉTÉ GÉNÉRALE, AND
RABOBANK GROUP,

Defendants.

Docket No. 1:12-cv-03419-GBD

**STIPULATION AND [PROPOSED] ORDER ADJOURNING
THE SHOKO CHUKIN BANK'S TIME TO MOVE, ANSWER,
OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

Plaintiff Jeffrey Laydon and Shoko Chukin Bank, by and through their respective undersigned counsel, and subject to this Court's approval and to the reservation of rights contained below, agree and stipulate as follows:

RECITALS

WHEREAS, on April 30, 2012, Jeffrey Laydon commenced this action in this District by the filing of a summons and complaint against the defendants herein;

WHEREAS, Shoko Chukin Bank is in the process of retaining counsel in connection with this action, and investigating the manner of service of the summons and complaint and the allegations of the complaint, but has authorized the undersigned counsel to execute this stipulation on its behalf, subject to the reservations of rights below; and

WHEREAS, Shoko Chukin Bank, while reserving all rights and without waiving any potential defenses it may have in this action, including without limitation as to insufficient service of process and lack of personal jurisdiction, desires to obtain an extension of time to move, answer, or otherwise respond to the complaint;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED as follows:


1. On or prior to June 29, 2012, Shoko Chukin Bank will inform plaintiff whether Shoko Chukin Bank believes that there has been insufficient service of process on it or will waive service of process.
2. Shoko Chukin Bank's time to answer, move, or otherwise respond to the complaint is hereby adjourned *sine die* and shall be determined by a later stipulation between the parties or Order of the Court.
3. This stipulation shall not act to shorten the time for Shoko Chukin Bank to answer, move, or otherwise respond to the complaint than Shoko Chukin Bank otherwise would have pursuant to the Federal Rules of Civil Procedure or any applicable local rules, and shall be without prejudice to Shoko Chukin Bank's right to seek, and plaintiff's right to oppose, an additional extension of time to respond to the complaint.

4. No defense of Shoko Chukin Bank, including without limitation the defenses of insufficient service of process or lack of personal jurisdiction, shall in any manner be waived or prejudiced by the execution of, agreement to, or filing of this stipulation. This stipulation shall not submit Shoko Chukin Bank to the jurisdiction of the Court and plaintiff will not use this stipulation to argue that Shoko Chukin Bank has submitted itself to the jurisdiction of this Court.

5. This stipulation may be executed in separate counterparts, and counterparts may be executed in facsimile form, each of which shall be deemed to be an original.

Dated: June 7, 2012.

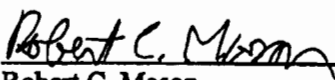
**LOWEY DANNENBERT COHEN
& HART, P.C.**



Vincent Briganti
Geoffrey Horn
One North Broadway
White Plains, NY 10601
Telephone: (914) 997-0500
Facsimile: (914) 997-0035
vbriganti@lowey.com
ghorn@lowey.com

Attorneys for Plaintiff Jeffrey Laydon

ARNOLD & PORTER LLP



Robert C. Mason
399 Park Avenue
New York, NY 10022
Telephone: (212) 715-1088
Facsimile: (212) 715-1399
robert.mason@aporter.com

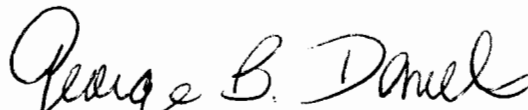
On behalf of Shoko Chukin Bank

SO ORDERED:

Dated:

JUN 12 2012

New York, New York


The Honorable George B. Daniels
United States District Judge